

IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO
CIVIL DIVISION

HARRY WILLIAMSON,)	CASE NO.: 22CV205156
)	
Plaintiff,)	
)	JUDGE JAMES MIRALDI
vs.)	
)	
LORAIN COUNTY, <i>et al.</i>,)	<u>DEFENDANT LORAIN COUNTY'S</u>
)	<u>RESPONSES TO PLAINTIFF'S</u>
Defendants.)	<u>REQUESTS FOR PRODUCTION OF</u>
)	<u>DOCUMENTS</u>

Defendant Lorain County, improperly identified, responds to Plaintiff's Requests for Document Production as follows:

1. Produce all documents described in your initial disclosures.

RESPONSE: SEE ATTACHED LDS000001-036596.

2. Produce the personnel file for Harry Williamson.

RESPONSE: SEE ATTACHED

3. Produce the personnel file for David Moore.

RESPONSE: SEE ATTACHED

4. Produce the personnel file for Matt Lundy.

RESPONSE: SEE ATTACHED

5. Produce the personnel file for Michelle Hung.

RESPONSE: SEE ATTACHED

6. Produce the personnel file for Tom Williams.

RESPONSE: SEE ATTACHED

7. Produce the personnel file for James Cordes.

RESPONSE: SEE ATTACHED

8. Produce the personnel file for Jen Sinatra.

RESPONSE: SEE ATTACHED

**EXHIBIT
A**

9. Produce the personnel file for J.D. Tomlinson.

RESPONSE: SEE ATTACHED

10. Produce the personnel file for Margaret Dever.

RESPONSE: SEE ATTACHED

11. Produce the personnel file for Angela Muniz.

RESPONSE: SEE ATTACHED

12. Produce the personnel file for Tim Carrion.

RESPONSE: SEE ATTACHED

13. Produce the personnel file for Alexis Swiniarski.

RESPONSE: SEE ATTACHED

14. Produce the personnel file for Miguel Monge.

RESPONSE: SEE ATTACHED

15. Produce the personnel file for Hannah Ferry.

RESPONSE: SEE ATTACHED

16. Produce the personnel file for Heather Arnold.

RESPONSE: SEE ATTACHED

17. Produce the personnel file for Jason Tatro.

RESPONSE: SEE ATTACHED

18. Produce the personnel file for Rob Weber.

RESPONSE: SEE ATTACHED

19. Produce the personnel file for Christina Blankenship.

RESPONSE: SEE ATTACHED

20. Produce the personnel file for Tiana Lewis.

RESPONSE: SEE ATTACHED

21. Produce the personnel file for Matthew Spears.

RESPONSE: SEE ATTACHED

22. Produce the personnel file for every employee terminated since December 31, 2020.

RESPONSE: SEE ATTACHED

23. Produce the personnel file for any employee who reported directly to David Moore, Matt Lundy, or Tom Williams from January 1, 2021 forward.

RESPONSE: SEE ATTACHED

24. Produce call logs for any work or mobile phone associated with any of the parties from October 1, 2020 forward.

RESPONSE: OBJECTION. RESPONSES TO THIS REQUEST WERE TO BE PRODUCED PURSUANT TO SUBPOENA DIRECTED TO PHONE CARRIER.

25. Produce call logs for any work or mobile phone associated with Michelle Hung, Jen Sinatra, Tracy Lopez, Aimee Marcil, Michelle Smith, Brian Algae, and Dave Welch from October 1, 2020 forward.

RESPONSE: OBJECTION. RESPONSES TO THIS REQUEST WERE TO BE PRODUCED PURSUANT TO SUBPOENA DIRECTED TO PHONE CARRIER.

26. Produce all e-mails mentioning or related to Harry Williamson from January 1, 2020 forward.

RESPONSE: SEE ATTACHED

27. Produce all records related to the relationship between Harry Williamson and Michelle Hung.

RESPONSE: OBJECTION. TO THE EXTENT ANY SUCH DOCUMENTS ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE, THOSE ARE NOT PRODUCED AS THERE IS NO WAIVER OF SUCH PRIVILEGE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED.

28. Produce all records of correspondence between any of the County commissioners and any member of the press, from October 1, 2020 forward.

RESPONSE: SEE ATTACHED

29. Produce all records of correspondence with Amanda Martinsek.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

30. Produce all records of correspondence with William Edwards.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

31. Produce all records of correspondence with William Novak.

RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS DOCUMENTS RELATED TO ATTORNEY NOVAK'S REPRESENTATION OF TOM WILLIAMS, WHICH WOULD BE PROTECTED BY THE ATTORNEY-

**CLIENT PRIVILEGE. TO THE EXTENT THIS REQUEST SEEKS
COMMUNICATION OUTSIDE OF SUCH, SEE ATTACHED.**

32. Produce the County's engagement agreement with Ulmer & Berne LLP.

**RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS ANY
ATTORNEY-CLIENT PRIVILEGE DOCUMENTATION, WHICH SUCH
PRIVILEGE IS NOT WAIVED. WITHOUT WAIVING SUCH OBJECTION,
SEE DOCUMENTS RESPONSIVE TO THIS REQUEST ALREADY
PRODUCED BY ULMER & BERNE LLP.**

33. Produce all billing records from Ulmer & Berne from January 1, 2020 forward.

**RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS ANY
ATTORNEY-CLIENT PRIVILEGE DOCUMENTATION, WHICH SUCH
PRIVILEGE IS NOT WAIVED. WITHOUT WAIVING SUCH OBJECTION,
SEE DOCUMENTS RESPONSIVE TO THIS REQUEST ALREADY
PRODUCED BY ULMER & BERNE LLP.**

34. Produce all county policies governing romantic or sexual relationships between County employees.

RESPONSE: SEE ATTACHED

35. Produce the personnel file of any employee known, reported, or believed to have been involved in a romantic or sexual relationship with another County employee at any point since January 1, 2017.

**RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY
BURDENSONME, NOT RELEVANT AND NOT CALCULATED TO LEAD TO
ADMISSIBLE EVIDENCE. TO THE EXTENT ANY EXIST, SEE ATTACHED.**

36. Produce records of any employee disclosing to the County a romantic or sexual relationship with another County employee from October 1, 2017 forward.

**RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY
BURDENSONME, NOT RELEVANT AND NOT CALCULATED TO LEAD TO
ADMISSIBLE EVIDENCE. TO THE EXTENT ANY EXIST, SEE ATTACHED.**

37. Produce an accounting of all expenditures of funds from the county's 911 levy, from January 1, 2018 forward.

RESPONSE: SEE ATTACHED

38. Produce an accounting of all county funds paid to Life Care or related entities.

RESPONSE: SEE ATTACHED

39. Produce all invoices from Everstream from January 1, 2018 forward.

**RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY
BURDENSONME, NOT RELEVANT TO THE CLAIMS AND UNLIKELY TO
LEAD TO ADMISSIBLE EVIDENCE.**

40. Produce all agreements with other jurisdictions for handling 911 calls.
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY BURDENSONE, NOT RELEVANT TO THE CLAIMS AND UNLIKELY TO LEAD TO ADMISSIBLE EVIDENCE.
41. Produce all invoices sent to other jurisdictions for handling 911 calls from October 1, 2018 forward.
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY BURDENSONE, NOT RELEVANT TO THE CLAIMS AND UNLIKELY TO LEAD TO ADMISSIBLE EVIDENCE.
42. Produce an accounting of all payments from other jurisdictions for handling 911 calls.
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY BURDENSONE, NOT RELEVANT TO THE CLAIMS AND UNLIKELY TO LEAD TO ADMISSIBLE EVIDENCE.
43. Produce all records related to plans to restructure the Lorain County Veterans' Committee, from January 1, 2020 forward.
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY BURDENSONE, VAGUE AND AMBIGUOUS, NOT RELEVANT TO THE CLAIMS AND UNLIKELY TO LEAD TO ADMISSIBLE EVIDENCE.
44. Produce all records related to the "Seven Districts plan," i.e., the proposal to replace the at-large Board of Commissioners with a board comprising representatives from different districts across the county.
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY BURDENSONE, VAGUE AND AMBIGUOUS, NOT RELEVANT TO THE CLAIMS AND UNLIKELY TO LEAD TO ADMISSIBLE EVIDENCE.
45. Produce all contracts related to plans for a convention center to be built at or near Midway Mall.
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY BURDENSONE, VAGUE AND AMBIGUOUS, NOT RELEVANT TO THE CLAIMS AND UNLIKELY TO LEAD TO ADMISSIBLE EVIDENCE.
46. Produce all records related to the plan to build a convention center at or near Midway Mall.
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY BURDENSONE, VAGUE AND AMBIGUOUS, NOT RELEVANT TO THE CLAIMS AND UNLIKELY TO LEAD TO ADMISSIBLE EVIDENCE.
47. Produce all records related to the bidding process for new emergency-management communications devices.
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD, UNDULY BURDENSONE, VAGUE AND AMBIGUOUS, NOT RELEVANT TO THE

**CLAIMS AND UNLIKELY TO LEAD TO ADMISSIBLE EVIDENCE.
WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED.**

48. Produce all records related to the termination of Harry Williamson's employment.
RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED.
49. Produce all records related to the termination of Tim Carrion's employment.
RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED. FURTHER, THIS REQUEST SEEKS DOCUMENTS THAT ARE NOT RELEVANT TO THE CLAIMS BROUGHT. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED.
50. Produce the Ulmer & Berne memo regarding the termination of Harry Williamson's employment.
RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED.
51. Produce the County's record retention schedules from October 1, 2020 forward.
RESPONSE: SEE ATTACHED
52. Produce all discovery requests and responses from *Williams v. Hung*, No. 1:21cv1863 (N.D. Ohio).
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD AND UNDULY BURDENSONE, NOT RELEVANT TO THE CLAIMS BROUGHT, AND NOT CALCULATED TO LEAD TO ADMISSIBLE EVIDENCE.
53. Produce all transcripts from depositions in *Williams v. Hung*, No. 1:21cv1863 (N.D. Ohio).
RESPONSE: OBJECTION. THIS REQUEST IS OVERLY BROAD AND UNDULY BURDENSONE, NOT RELEVANT TO THE CLAIMS BROUGHT, AND NOT CALCULATED TO LEAD TO ADMISSIBLE EVIDENCE.
54. Produce all documents supporting your statute of frauds defense.
RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.
55. Produce all documents supporting your statute of limitations defense.
RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE.

WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

56. Produce all documents supporting your insufficient process defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

57. Produce all documents supporting your improper joinder defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

58. Produce all documents supporting your duress defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

59. Produce all documents supporting your waiver defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

60. Produce all documents supporting your estoppel defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

61. Produce all documents supporting your collateral estoppel defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

62. Produce all documents supporting your laches defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

63. Produce all documents supporting your unclean hands defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

64. Produce all documents supporting your illegality defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

65. Produce all documents supporting your payment defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

66. Produce all documents supporting your release defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

67. Produce all documents supporting your *res judicata* defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE ATTACHED AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

Respectfully submitted,

/s/ Brian C. Lee

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*Counsel for Defendants Lorain County, David Moore,
Matt Lundy, Tom Williams, and James Cordes*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via electronic mail this 26th day of August 2022, upon the following:

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Cleveland, Ohio 44113

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*Counsel for Defendants Amanda Martinsek
and Ulmer & Berne, LLP*

/s/ Brian C. Lee

BRIAN C. LEE (0081675)

IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO
CIVIL DIVISION

HARRY WILLIAMSON,)	CASE NO.: 22CV205156
)	
Plaintiff,)	
)	JUDGE JAMES MIRALDI
vs.)	
)	
LORAIN COUNTY, <i>et al.</i> ,)	<u>DEFENDANT DAVID MOORE'S</u>
)	<u>RESPONSES TO PLAINTIFF'S</u>
Defendants.)	<u>REQUESTS FOR PRODUCTION OF</u>
)	<u>DOCUMENTS</u>

Defendant David Moore, by and through counsel, responds to Plaintiff's Requests for Document Production as follows:

1. Produce all documents described in your initial disclosures.

RESPONSE: DEFENDANT MOORE HAS NO DOCUMENTS IN HIS PERSONAL POSSESSION. ALL DOCUMENTS ARE IN POSSESSION OF LORAIN COUNTY, AND AS SUCH, ANY DOCUMENTS THAT ARE OR WOULD BE RESPONSIVE TO THIS REQUEST, TO THE EXTENT THEY EXIST, SHOULD BE REFERENCED IN LORAIN COUNTY'S RESPONSES.

2. Produce records of all phone calls to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE: RESPONSES TO THIS REQUEST WERE TO BE PRODUCED PURSUANT TO SUBPOENA DIRECTED TO PHONE CARRIER.

3. Produce records of all text messages related to Mr. Williamson or the allegations in his Complaint, to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE: NONE.

4. Produce all e-mails mentioning or related to Harry Williamson from January 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

5. Produce all records related to the relationship between Harry Williamson and Michelle Hung.

RESPONSE: SEE RESPONSE TO RPD #1.

6. Produce all records of correspondence with any member of the press, from October 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

7. Produce all records of correspondence with Amanda Martinsek.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

8. Produce all records of correspondence with William Edwards.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

9. Produce all records of correspondence with William Novak.

RESPONSE: NONE

10. Produce all records related to plans to restructure the Lorain County Veterans' Committee, from January 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

11. Produce all records related to the "Seven Districts plan," i.e., the proposal to replace the at-large Board of Commissioners with a board comprising representatives from different districts across the county.

RESPONSE: SEE RESPONSE TO RPD #1.

12. Produce all contracts related to the plan to build a convention center at or near Midway Mall.

RESPONSE: SEE RESPONSE TO RPD #1.

13. Produce all records related to the plan to build a convention center at or near Midway Mall.

RESPONSE: SEE RESPONSE TO RPD #1.

14. Produce all records related to the bidding process for new emergency-management communications devices.

RESPONSE: SEE RESPONSE TO RPD #1.

15. Produce all records related to the termination of Harry Williamson's employment.

RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED BY DEFENDANT. WITHOUT WAIVING SAID OBJECTION, SEE RESPONSE TO RPD #1.

16. Produce all records related to the termination of Tim Carrion's employment.

RESPONSE: SEE RESPONSE TO RPD #1.

17. Produce the Ulmer & Berne memo regarding the termination of Harry Williamson's employment.

RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED.

18. Produce all documents supporting your statute of frauds defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE RESPONSE TO RPD #1 AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

19. Produce all documents supporting your statute of limitations defense.

RESPONSE: SEE RESPONSE TO RPD#18.

20. Produce all documents supporting your insufficient process defense.

RESPONSE: SEE RESPONSE TO RPD#18.

21. Produce all documents supporting your improper joinder defense.

RESPONSE: SEE RESPONSE TO RPD#18.

22. Produce all documents supporting your duress defense.

RESPONSE: SEE RESPONSE TO RPD#18.

23. Produce all documents supporting your waiver defense.

RESPONSE: SEE RESPONSE TO RPD#18.

24. Produce all documents supporting your estoppel defense.

RESPONSE: SEE RESPONSE TO RPD#18.

25. Produce all documents supporting your collateral estoppel defense.

RESPONSE: SEE RESPONSE TO RPD#18.

26. Produce all documents supporting your laches defense.

RESPONSE: SEE RESPONSE TO RPD#18.

27. Produce all documents supporting your unclean hands defense.

RESPONSE: SEE RESPONSE TO RPD#18.

28. Produce all documents supporting your illegality defense.

RESPONSE: SEE RESPONSE TO RPD#18.

29. Produce all documents supporting your payment defense.

RESPONSE: SEE RESPONSE TO RPD#18.

30. Produce all documents supporting your release defense.

RESPONSE: SEE RESPONSE TO RPD#18.

31. Produce all documents supporting your *res judicata* defense.

RESPONSE: SEE RESPONSE TO RPD#18.

Respectfully submitted,

/s/ Brian C. Lee

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*Counsel for Defendants Lorain County, David Moore,
Matt Lundy, Tom Williams, and James Cordes*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via electronic mail this 26th day of August 2022, upon the following:

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*Counsel for Defendants Amanda Martinsek
and Ulmer & Berne, LLP*

/s/ Brian C. Lee
BRIAN C. LEE (0081675)

IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO
CIVIL DIVISION

HARRY WILLIAMSON,)	CASE NO.: 22CV205156
)	
Plaintiff,)	
)	JUDGE JAMES MIRALDI
vs.)	
)	
LORAIN COUNTY, <i>et al.</i> ,)	<u>DEFENDANT MATT LUNDY'S</u>
)	<u>RESPONSES TO PLAINTIFF'S</u>
Defendants.)	<u>REQUESTS FOR PRODUCTION OF</u>
)	<u>DOCUMENTS</u>

Defendant Matt Lundy, by and through counsel, responds to Plaintiff's Requests for Document Production as follows:

1. Produce all documents described in your initial disclosures.

RESPONSE: DEFENDANT LUNDY HAS NO DOCUMENTS IN HIS PERSONAL POSSESSION. ALL DOCUMENTS ARE IN POSSESSION OF LORAIN COUNTY, AND AS SUCH, ANY DOCUMENTS THAT ARE OR WOULD BE RESPONSIVE TO THIS REQUEST, TO THE EXTENT THEY EXIST, SHOULD BE REFERENCED IN LORAIN COUNTY'S RESPONSES.

2. Produce records of all phone calls to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE: RESPONSES TO THIS REQUEST WERE TO BE PRODUCED PURSUANT TO SUBPOENA DIRECTED TO PHONE CARRIER.

3. Produce records of all text messages related to Mr. Williamson or the allegations in his Complaint, to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE: NONE.

4. Produce all e-mails mentioning or related to Harry Williamson from January 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

5. Produce all records related to the relationship between Harry Williamson and Michelle Hung.

RESPONSE: SEE RESPONSE TO RPD #1.

6. Produce all records of correspondence with any member of the press, from October 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

7. Produce all records of correspondence with Amanda Martinsek.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

8. Produce all records of correspondence with William Edwards.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

9. Produce all records of correspondence with William Novak.

RESPONSE: NONE

10. Produce all records related to plans to restructure the Lorain County Veterans' Committee, from January 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

11. Produce all records related to the "Seven Districts plan," i.e., the proposal to replace the at-large Board of Commissioners with a board comprising representatives from different districts across the county.

RESPONSE: SEE RESPONSE TO RPD #1.

12. Produce all contracts related to the plan to build a convention center at or near Midway Mall.

RESPONSE: SEE RESPONSE TO RPD #1.

13. Produce all records related to the plan to build a convention center at or near Midway Mall.

RESPONSE: SEE RESPONSE TO RPD #1.

14. Produce all records related to the bidding process for new emergency-management communications devices.

RESPONSE: SEE RESPONSE TO RPD #1.

15. Produce all records related to the termination of Harry Williamson's employment.

RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED BY DEFENDANT. WITHOUT WAIVING SAID OBJECTION, SEE RESPONSE TO RPD #1.

16. Produce all records related to the termination of Tim Carrion's employment.

RESPONSE: SEE RESPONSE TO RPD #1.

17. Produce the Ulmer & Berne memo regarding the termination of Harry Williamson's employment.

RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED.

18. Produce all documents supporting your statute of frauds defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE RESPONSE TO RPD #1 AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

19. Produce all documents supporting your statute of limitations defense.

RESPONSE: SEE RESPONSE TO RPD#18.

20. Produce all documents supporting your insufficient process defense.

RESPONSE: SEE RESPONSE TO RPD#18.

21. Produce all documents supporting your improper joinder defense.

RESPONSE: SEE RESPONSE TO RPD#18.

22. Produce all documents supporting your duress defense.

RESPONSE: SEE RESPONSE TO RPD#18.

23. Produce all documents supporting your waiver defense.

RESPONSE: SEE RESPONSE TO RPD#18.

24. Produce all documents supporting your estoppel defense.

RESPONSE: SEE RESPONSE TO RPD#18.

25. Produce all documents supporting your collateral estoppel defense.

RESPONSE: SEE RESPONSE TO RPD#18.

26. Produce all documents supporting your laches defense.

RESPONSE: SEE RESPONSE TO RPD#18.

27. Produce all documents supporting your unclean hands defense.

RESPONSE: SEE RESPONSE TO RPD#18.

28. Produce all documents supporting your illegality defense.

RESPONSE: SEE RESPONSE TO RPD#18.

29. Produce all documents supporting your payment defense.

RESPONSE: SEE RESPONSE TO RPD#18.

30. Produce all documents supporting your release defense.

RESPONSE: SEE RESPONSE TO RPD#18.

31. Produce all documents supporting your *res judicata* defense.

RESPONSE: SEE RESPONSE TO RPD#18.

Respectfully submitted,

/s/ Brian C. Lee

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*Counsel for Defendants Lorain County, David Moore,
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via electronic mail this 26th day of August 2022, upon the following:

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*Counsel for Defendants Amanda Martinsek
and Ulmer & Berne, LLP*

/s/ Brian C. Lee
BRIAN C. LEE (0081675)

IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO
CIVIL DIVISION

HARRY WILLIAMSON,)	CASE NO.: 22CV205156
)	
Plaintiff,)	
)	JUDGE JAMES MIRALDI
vs.)	
)	
LORAIN COUNTY, <i>et al.</i> ,)	<u>DEFENDANT JAMES CORDES'</u>
)	<u>RESPONSES TO PLAINTIFF'S</u>
Defendants.)	<u>REQUESTS FOR PRODUCTION OF</u>
)	<u>DOCUMENTS</u>

Defendant James Cordes, by and through counsel, responds to Plaintiff's Requests for Document Production as follows:

1. Produce all documents described in your initial disclosures.

RESPONSE: DEFENDANT CORDES HAS NO DOCUMENTS IN HIS POSSESSION. ALL DOCUMENTS ARE IN POSSESSION OF LORAIN COUNTY, AND AS SUCH, ANY DOCUMENTS THAT ARE OR WOULD BE RESPONSIVE TO THIS REQUEST, TO THE EXTENT THEY EXIST, SHOULD BE REFERENCED IN LORAIN COUNTY'S RESPONSES.

2. Produce records of all phone calls to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE: RESPONSES TO THIS REQUEST WERE TO BE PRODUCED PURSUANT TO SUBPOENA DIRECTED TO PHONE CARRIER.

3. Produce records of all text messages related to Mr. Williamson or the allegations in his Complaint, to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE: NONE

4. Produce all e-mails mentioning or related to Harry Williamson from January 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

5. Produce all records related to the relationship between Harry Williamson and Michelle Hung.

RESPONSE: SEE RESPONSE TO RPD #1.

6. Produce all records of correspondence with any member of the press, from October 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

7. Produce all records of correspondence with Amanda Martinsek.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

8. Produce all records of correspondence with William Edwards.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

9. Produce all records of correspondence with William Novak.

RESPONSE: NONE.

10. Produce all records related to plans to restructure the Lorain County Veterans' Committee, from January 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

11. Produce all records related to the "Seven Districts plan," i.e., the proposal to replace the at-large Board of Commissioners with a board comprising representatives from different districts across the county.

RESPONSE: SEE RESPONSE TO RPD #1.

12. Produce all contracts related to the plan to build a convention center at or near Midway Mall.

RESPONSE: SEE RESPONSE TO RPD #1.

13. Produce all records related to the plan to build a convention center at or near Midway Mall.

RESPONSE: SEE RESPONSE TO RPD #1.

14. Produce all records related to the bidding process for new emergency-management communications devices.

RESPONSE: SEE RESPONSE TO RPD #1.

15. Produce all records related to the termination of Harry Williamson's employment.

RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED BY DEFENDANT. WITHOUT WAIVING SAID OBJECTION, SEE RESPONSE TO RPD #1.

16. Produce all records related to the termination of Tim Carrion's employment.

RESPONSE: SEE RESPONSE TO RPD #1.

17. Produce the Ulmer & Berne memo regarding the termination of Harry Williamson's employment.

RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED.

18. Produce all documents supporting your statute of frauds defense.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY PRIVILEGE AND/OR WORK-PRODUCT DOCTRINE. WITHOUT WAIVING SAID OBJECTION, SEE RESPONSE TO RPD #1 AS WELL AS OTHER DOCUMENTS THAT ARE PRODUCED DURING DISCOVERY OF THIS LAWSUIT.

19. Produce all documents supporting your statute of limitations defense.

RESPONSE: SEE RESPONSE TO RPD #18.

20. Produce all documents supporting your insufficient process defense.

RESPONSE: SEE RESPONSE TO RPD #18.

21. Produce all documents supporting your improper joinder defense.

RESPONSE: SEE RESPONSE TO RPD #18.

22. Produce all documents supporting your duress defense.

RESPONSE: SEE RESPONSE TO RPD #18.

23. Produce all documents supporting your waiver defense.

RESPONSE: SEE RESPONSE TO RPD #18.

24. Produce all documents supporting your estoppel defense.

RESPONSE: SEE RESPONSE TO RPD #18.

25. Produce all documents supporting your collateral estoppel defense.

RESPONSE: SEE RESPONSE TO RPD #18.

26. Produce all documents supporting your laches defense.

RESPONSE: SEE RESPONSE TO RPD #18.

27. Produce all documents supporting your unclean hands defense.

RESPONSE: SEE RESPONSE TO RPD #18.

28. Produce all documents supporting your illegality defense.

RESPONSE: SEE RESPONSE TO RPD #18.

29. Produce all documents supporting your payment defense.

RESPONSE: SEE RESPONSE TO RPD #18.

30. Produce all documents supporting your release defense.

RESPONSE: SEE RESPONSE TO RPD #18.

31. Produce all documents supporting your *res judicata* defense.

RESPONSE: SEE RESPONSE TO RPD #18.

Respectfully submitted,

/s/ Brian C. Lee

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*Counsel for Defendants Lorain County, David Moore,
Matt Lundy, Tom Williams, and James Cordes*

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*Counsel for Defendants Amanda Martinsek
and Ulmer & Berne, LLP*

/s/ Brian C. Lee
BRIAN C. LEE (0081675)

IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO
CIVIL DIVISION

HARRY WILLIAMSON,)	CASE NO.: 22CV205156
)	
Plaintiff,)	
)	JUDGE JAMES MIRALDI
vs.)	
)	
LORAIN COUNTY, <i>et al.</i> ,)	<u>DEFENDANT TOM WILLIAMS'</u>
)	<u>RESPONSES TO PLAINTIFF'S</u>
Defendants.)	<u>REQUESTS FOR PRODUCTION OF</u>
)	<u>DOCUMENTS</u>

Defendant Tom Williams, by and through counsel, responds to Plaintiff's Requests for Document Production as follows:

1. Produce all documents described in your initial disclosures.

RESPONSE: DEFENDANT WILLIAMS HAS NO DOCUMENTS IN HIS PERSONAL POSSESSION. ALL DOCUMENTS ARE IN POSSESSION OF LORAIN COUNTY, AND AS SUCH, ANY DOCUMENTS THAT ARE OR WOULD BE RESPONSIVE TO THIS REQUEST, TO THE EXTENT THEY EXIST, SHOULD BE REFERENCED IN LORAIN COUNTY'S RESPONSES.

2. Produce records of all phone calls to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE: RESPONSES TO THIS REQUEST WERE TO BE PRODUCED PURSUANT TO SUBPOENA DIRECTED TO PHONE CARRIER.

3. Produce records of all text messages related to Mr. Williamson or the allegations in his Complaint, to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE: SEE ATTACHED WILLIAMS001-021.

4. Produce all e-mails mentioning or related to Harry Williamson from January 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1. DEFENDANT WILLIAMS WILL SUPPLEMENT SHOULD ADDITIONAL RESPONSIVE DOCUMENT BE FOUND.

5. Produce all records related to the relationship between Harry Williamson and Michelle Hung.

RESPONSE: SEE RESPONSE TO RPD #1. DEFENDANT WILLIAMS WILL SUPPLEMENT SHOULD ADDITIONAL RESPONSIVE DOCUMENT BE FOUND.

6. Produce all records of correspondence with any member of the press, from October 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

7. Produce all records of correspondence with Amanda Martinsek.

RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

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RESPONSE: OBJECTION. THIS REQUEST SEEKS DOCUMENTS THAT ARE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE AND THE SAME IS NOT BEING WAIVED.

9. Produce all records of correspondence with William Novak.

RESPONSE: OBJECTION. THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED.

10. Produce all records related to plans to restructure the Lorain County Veterans' Committee, from January 1, 2020 forward.

RESPONSE: SEE RESPONSE TO RPD #1.

11. Produce all records related to the "Seven Districts plan," i.e., the proposal to replace the at-large Board of Commissioners with a board comprising representatives from different districts across the county.

RESPONSE: SEE RESPONSE TO RPD #1.

12. Produce all contracts related to the plan to build a convention center at or near Midway Mall.

RESPONSE: SEE RESPONSE TO RPD #1.

13. Produce all records related to the plan to build a convention center at or near Midway Mall.

RESPONSE: SEE RESPONSE TO RPD #1.

14. Produce all records related to the bidding process for new emergency-management communications devices.

RESPONSE: SEE RESPONSE TO RPD #1.

15. Produce all records related to the termination of Harry Williamson's employment.

RESPONSE: OBJECTION, TO THE EXTENT THIS REQUEST SEEKS TO INVADE THE ATTORNEY-CLIENT PRIVILEGE, WHICH IS NOT BEING WAIVED BY DEFENDANT. WITHOUT WAIVING SAID OBJECTION, SEE RESPONSE TO RPD #1.

16. Produce all records related to the termination of Tim Carrion's employment.

RESPONSE: SEE RESPONSE TO RPD #1.

17. Produce the Ulmer & Berne memo regarding the termination of Harry Williamson's employment.

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RESPONSE: SEE RESPONSE TO RPD#18.

31. Produce all documents supporting your *res judicata* defense.

RESPONSE: SEE RESPONSE TO RPD#18.

Respectfully submitted,

/s/ Brian C. Lee

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*Counsel for Defendants Lorain County, David Moore,
Matt Lundy, Tom Williams, and James Cordes*

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